



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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Central Islip, New York 11722*

November 8, 2024

By ECF

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Arevalo-Chavez, et al.
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

We write on behalf of the government in the above captioned matter, and with the consent of all defense counsel and their clients, to respectfully request an adjournment of the next status conference, which is presently set for November 12, 2024 before the Court.

At this time, the defendants and their counsel are continuing to review the voluminous Rule 16 discovery that has been produced to date. Additionally, the government anticipates producing supplemental discovery materials next week. Furthermore, the government and several counsel have been engaged in discussions concerning a potential resolution of this matter short of trial. However, the parties require additional time in order to continue, and complete, these discussions.

For the foregoing reasons, and in consultation with all counsel and with Your Honor's Chambers, it is respectfully requested that next week's status conference be adjourned until January 30, 2025. Additionally, in light of the foregoing, the government respectfully requests the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interests of justice, from today until the January 30 conference date. The undersigned government counsel have conferred with counsel for each of the defendants, who have indicated that they, and their respective clients, have no objection to

this request. Further, this has previously been designated as a complex case, pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii), and the reasons for that designation remain.

Respectfully submitted,

BREON PEACE
United States Attorney

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